### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| QUALCOMM INCORPORATED,             | )                           |
|------------------------------------|-----------------------------|
| a Delaware corporation; and        |                             |
| QUALCOMM TECHNOLOGIES, INC.,       |                             |
| a Delaware corporation,            |                             |
| -                                  | ) C.A. No. 24-490 (MN)      |
| Plaintiffs,                        | )                           |
|                                    | )                           |
| v.                                 |                             |
|                                    |                             |
| ARM HOLDINGS PLC., f/k/a ARM LTD., | )                           |
| a U.K. corporation,                | REDACTED PUBLIC VERSION     |
|                                    | ) REPRETED TO BEIG VERGIOIN |
| Defendant.                         | )                           |

#### PLAINTIFFS' RESPONSE TO DEFENDANT'S CONCISE STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT THAT OF THE TLA AND ALA IS **UNENFORCEABLE (D.I. 426)**

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Original filing date: November 7, 2025 Redacted filing date: November 21, 2025

#### I. THE ALA AND TLA LICENSE AGREEMENTS<sup>1</sup>

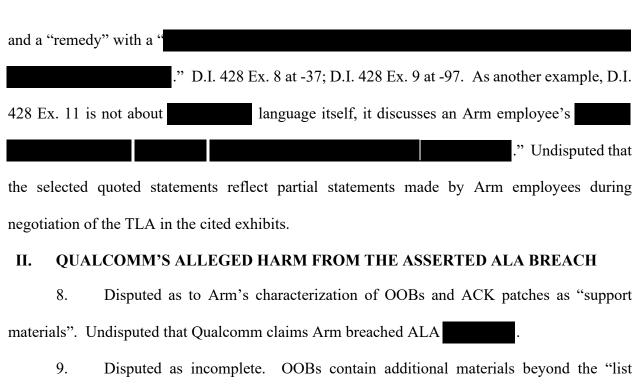
- 1. Undisputed, as any dispute is not material for purposes of this motion.
- 2. Disputed in part. Qualcomm's ALA allows Qualcomm to commercialize certain custom CPU cores. D.I. 428 Ex. 2. Otherwise, undisputed for purposes of this motion.
- 3. Disputed to the extent Arm forecasts future royalties, at least because Arm fails to provide any methodology or data used to arrive at the speculative forecast in D.I. 428 Ex. 5. Additionally, Arm cannot present this (D.I. 428 Ex. 5) in admissible form at trial. Undisputed for purposes of this motion that in "

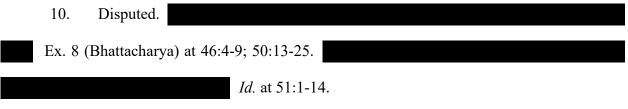
  "; that "
- 4. Disputed as incomplete to the extent Arm characterizes of the ALA and TLA as the entire "provisions in those agreements. Disputed to as to Arm's characterization of ALA and TLA. Undisputed that the quoted words appear in the cited Section of the ALA, and that the TLA and ALA contain provisions.
  - 5. Undisputed that the quoted words appear in the cited Section of the TLA.
- 6. Disputed as to Arm's characterization that Mr. Weiser and as incomplete where Arm characterizes Mr. Weiser's testimony without context. Undisputed that the quoted statements appear in Jonathan Weiser's deposition transcript.
- 7. Disputed that the quoted language reflects statements by Arm employees that

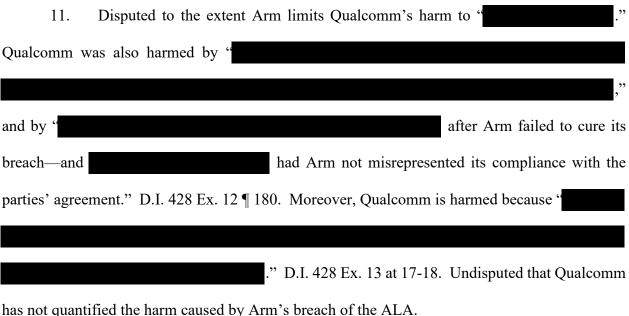
  Disputed that Qualcomm "did not dispute" that

  For example, Qualcomm referred to the provision as a "provision" provision

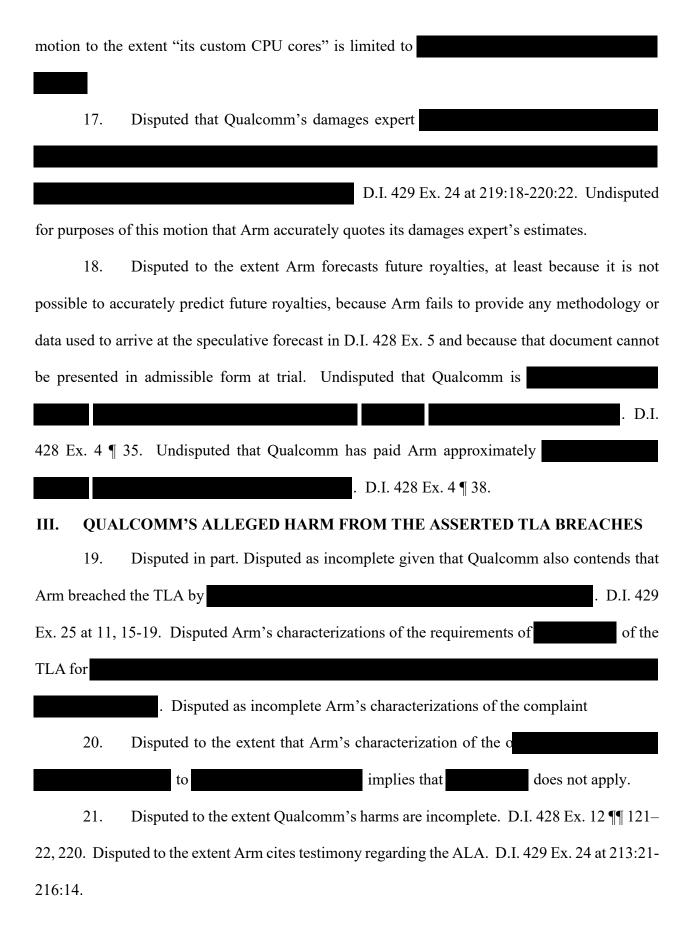
<sup>&</sup>lt;sup>1</sup> For ease of reference, Plaintiffs have copied Arm's headings, but do not necessarily agree that Arm's headings are accurate.



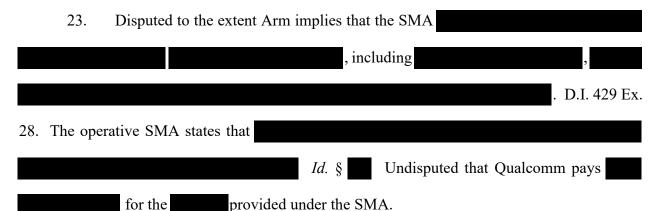




| 12.          | Disputed as to Arm's characterizations of statements made by Jignesh Trivedi. Mr.       |
|--------------|---|
| Trivedi repo | eatedly testified that  |
|              | D.I. 429 Ex. 14 at 49:3-7; see also id. at 47:9-51:7, 99:3-13, 174:3-5                  |
|              | ).  |
| 13.          | Disputed as incomplete. Mr. Trivedi testified that                                      |
|              |   |
|              | D.I. 429  |
| Ev. 14 of 17 |   |
| EX. 14 at 17 | 76:15-24. Disputed to the extent that Arm characterizes Mr. Trivedi as testifying about |
| the time sp  | ent resolving test issues by Qualcomm's entire custom-core compliance verification      |
| team.        |   |
| 14.          | Disputed as incomplete. Mr. Golden testified that                                       |
|              |   |
|              | (Id. at   |
| 84:25-85:13  | 3). Mr. Golden also testified that  |
|              | D.I. 429 Ex. 20 at 91:10-92:9.  |
|              |   |
| 15.          | Disputed as to Arm's characterizations of statements made by Mr. Trivedi and the        |
| extent to w  | which that testimony was within the scope of his capacity as Qualcomm's 30(b)(6)        |
| representati | ive. D.I. 429 Ex. 14 at 240:3-20  |
|              | ), 250:15-25.   |
| 16.          | Disputed that   |
|              | See D.I. 429 Ex. 14 at 51:24-52:13, 54:16-23, 55:7-13; Ex. 18 at                        |
| 62.8.20. 70  |   |
| 02.8-20, /   | 0:17-24; D.I. 428 Ex. 6 at 156:22-158:4 (   |
|              | ). Undisputed for purposes of this  |



22. Undisputed for purposes of this motion.



24. Disputed to the extent Arm forecasts future royalties, at least because it is not possible to accurately predict future royalties, because Arm fails to provide any explanation for the data behind or the methodology used to arrive at the speculative forecast in D.I. 428 Ex. 5 and because that document cannot be presented in admissible form at trial. Undisputed that Qualcomm is entitled to

D.I. 428 Ex. 12 ¶¶ 219, 225. Undisputed that Qualcomm has paid Arm approximately

D.I. 428 Ex.

4 ¶ 47.

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on November 7, 2025, upon the following in the manner indicated:

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